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July 15, 2017

VIA ECF

Hon. George B. Daniels
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Tantaros v. Fox News Network, LLC et al.*, Case No. 17-cv-02958 (GBD)

Dear Judge Daniels:

We represent Defendants Peter A. Snyder and Disruptor, Inc. (collectively, the "Moving Defendants" or "our clients") in the above-captioned action. Plaintiff Andrea Tantaros's counsel has advised us that he has a medical issue that will require an imminent surgical procedure, so he cannot complete briefing on our clients' parallel motions to dismiss or, alternatively, to compel arbitration and for Rule 11 sanctions by July 21, as Your Honor ordered on July 6, per the parties' previously agreed-upon schedule. *See* ECF No. 62. Accordingly, pursuant to Rule II.D of Your Honor's Individual Rules and Practices, he has requested and we consent to an extension of time with respect to the briefing schedule as follows: Ms. Tantaros's opposition papers will have to be filed by August 8, 2017, and the Moving Defendants' reply papers will have to be filed by August 31, 2017.

In addition, because the Moving Defendants' motions will now not be fully submitted by the initial conference date, currently scheduled for August 3, 2017, and these motions are similar to motions already made by the Fox News Defendants that will be fully submitted by that date, all parties agree that it makes sense to hold the initial conference after all of these related motions are fully submitted, and we therefore hereby respectfully request, with the consent of all counsel of record in the case, that the initial conference be adjourned until September 5, 2017.

This is the second request for extensions of these briefing deadlines and fourth request for adjournment of the initial conference. Your Honor granted the previous requests.

Respectfully,

/s/ Randy M. Mastro

Randy M. Mastro

cc: All counsel of record (via ECF)